

March 10, 2011

With reference to:
Part of Lot 20, Concession 9, Town of Halton Hills

**Town of Halton Files:
D12SUB09.001 (24T-09001/H) & D14ZBA09.006
Eden Oak - 2147925 Ontario Ltd. (Glen Williams)
Proposed 32-Lot Residential Subdivision
(formerly File D12/D14 Devins)**

**Mark Kluge,
Senior Planner - Development Review
Town of Halton Hills**

Dear Mark:

The Glen Williams Community Association (GWCA) thanks the Town for the opportunity to comment on the updated Environmental Implementation Report – December 2010, submitted for this Eden Oak development.

Again, we would request that these comments be shared with the appropriate departments (Planning, Engineering, Recreation & Parks) for the Town of Halton Hills, the Region of Halton and the Credit Valley Conservation, in order that they can note our concerns in their analysis. If they have not already received it, we ask that our letter of August 24, 2010 concerning this application also be forwarded to them.

The Environmental Implementation Report – December 2010 is very clear that it is important to maintain the quantity and quality of groundwater recharge on this site and to maximize infiltration on the property to lessen the impact of development on the neighboring properties and the receiving watercourse downstream (Silver Creek).

As we have noted in our previous letter, the current design of the proposed development does not go far enough to achieve these objectives:

1. Soil Conditions:

Poor soil conditions exist on this property and were central to the OMB decision to reduce the previous Devins application from 12 large lots to 8 large lots. The proposal for 32 smaller lots with an increased number of lot side ditches, hard surface driveways and paved roads on this poor soil will adversely impact recharge and infiltration on this property and stormwater management for the wider community. To achieve the desired recharge and infiltration in this soil, a more open, natural and sustainable subdivision design incorporating fewer lots is needed. A reduction in the number of lots must be considered.

2. Hamlet Buffer, Park/Green Space:

The proposed development should make better use of such design tools as the hamlet buffer and park/green space to assist with recharge and infiltration. One purpose for the buffer is allow lands to regenerate as natural areas. When the 4.5m buffer was suggested for the Devins application, it was linked to a less intense development of 8 large lots. Given the increased intensity of development now proposed with more homes on smaller lots, a proper 20m naturalized buffer should be utilized to improve both the recharge and infiltration on this property. Similarly the provision of a proper park, separate from the stormwater management pond, should be used to assist these objectives. Provision of a 20m hamlet buffer and a neighbourhood park/green space must be considered.

3. Road Design, Grading and Stormwater Management:

The previous Environmental Implementation Report called for a reduction in stormwater flow from the property across 8th Line, down Wildwood Road and into Silver Creek. How have the findings of the December 2010 Report changed and improved the development's design to achieve this? Reference is made in the report that an enhanced level of stormwater control, Level 1 or Enhanced Protection, will be implemented in the Stormwater Management facility to mitigate quality and discharge. What does that mean? How is it to be achieved? The report says that it is critical that all on-site measures be taken to the extent possible to maintain and enhance the local infiltration functions on the subject site, yet the development continues to follow an urban approach of hard road and curb surfaces, grading and underground storm sewers. How has the grading been improved to increase retention and mitigate drainage from this property on to neighbouring properties? The report suggests that the development consider reducing the amount of water that reaches the stormwater facility through infiltration trenches and bio-retention, etc., yet the subdivision design continues to omit the sustainable development features of a rural road profile with open ditches, turfstone, bio-swales, etc. utilized by the CVC, Town and Region in other developments in Glen Williams. On-site measures such as these would improve infiltration on the land, plus give the preferred rural Glen appearance to the development. A redesign of this development incorporating a wider range of sustainable design features for recharge and infiltration must be considered.

From a review of the Environmental Implementation Report – December 2010, it is our view that “a greener solution” than the one currently being proposed is needed for this subdivision. The developer needs to reflect upon the intent of the Glen Williams Secondary Plan (GWSP) to maintain and enhance the rural character of the hamlet and provide a more creative and sustainable design for this development.

Regards,

Drew Leverette
Wayne Van Hinte
Gary Adamson
Thom Gallagher
Keith Powell
Bill Shuttleworth

Glen Williams Community Association (GWCA)